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AUG 23 2006

**Formal Complaint to the Washington State Public Disclosure Commission  
Relating to an Elected Official or Candidate for Public Office**

Name of Official or Candidate: Christine N Rolfes  
Address of Official or Candidate: 16710 Agate Pass Rd NE  
Official's or Candidate's Bainbridge Island WA 98110  
City State Zip Code  
Official's or Candidate's Telephone: 206 842 8029  
(Include Area Code)

Official's or Candidate's E-Mail Address: \_\_\_\_\_  
(If known)

Your signature:   
Your printed name: Edward B Habecker  
Street address: 19062 State Hwy 305 NE Suite 201  
City, state and zip code: Poulsbo WA 98370  
Telephone number: 360 697 1666 360 779 5053  
E-Mail Address: (Optional) \_\_\_\_\_  
Date Signed: 8/23/2006  
Place Signed (City and County): Poulsbo Kitsap County  
City County

**Complaint: (Attach Complaint and Certification)**

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**Certification for a**  
**Complaint to the Washington State Public Disclosure Commission Relating to an**  
**Elected Official or Candidate for Public Office**  
**(Notary Not Required)**

Public Disclosure Commission

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth in this attached complaint are true and correct.

Your signature: 

Your printed name: Edward B Habecker

Street address: 19062 State Hwy 305 NE Suite 201

City, state and zip code: Poulsbo WA 98370

Telephone number: 360 697 1666 360 779 5053

E-Mail Address: (Optional) \_\_\_\_\_

Date Signed: 8/23/2006

Place Signed (City and County): Poulsbo Kitsap County  
City County

\*RCW 9A.72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

COMPLAINT ATTACHED

August 23, 2006

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Mr. Phil Stutzman  
Public Disclosure Commission  
711 Capitol Way #206  
Olympia, WA 98504-0908

Public Disclosure Commission

Dear Mr. Stutzman:

Please accept this letter as a formal complaint regarding Ms. Christine Rolfes, Candidate for House of Representatives District 23 Position 2 and a request for an investigation by the Public Disclosure Commission into what appears to me to be willful negligence and flagrant disregard of the campaign financial reporting requirements.

Issue 1 - Deposits must be deposited timely

All monetary contributions must be deposited within 5 business days of receipt (RCW 42.17.060). Reports of Cash Receipts Monetary Contributions (C3) filed to date reflect consistent violations of this requirement:

<u>Conf. #</u>	<u>Deposit Date</u>	<u>C-3 Date</u>	<u>Number Over 5 Days</u>
100177258	7/11/2006	8/10/2006	11 (5/20/06 - 6/25/06)
100177259	7/28/2006	8/10/2006	28 (6/20/06 - 7/19/06)
100177260	8/01/2006	8/10/2006	5 (6/29/06 - 7/24/06)
100178671	8/14/2006	8/21/2006	52 (7/7/06 - 8/06/06)

Issue 2 - C3 Reports to be filed weekly

The reporting schedule for 2006 requires weekly (each Monday) reporting of cash receipts commencing July 1. Ms. Rolfes did not file timely reports (C3) for the weeks of 7/3, 7/10, 7/17, 7/24, 7/31, 8/7, 8/14, or 8/21. She has never filed a timely report since weekly reporting commenced.

Issue 3 - Contributor Information Omitted

WAC 390-16 requires that for any individual who has contributed in the aggregate more than \$100, the person's occupation, employer and employer location must also be disclosed. The C3 reports filed by Ms. Rolfes are consistently missing this information.

An analysis of contributors reported through 8/10/06 taken from data then available on the PDC web site (analysis attached) shows 179 instances where the required information was omitted. Additionally the C3 filed 8/21 for the 8/14 deposit (52 entries in all) is totally devoid of any employer data.

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Issue 4 - Violation of Contribution Limits

Public Disclosure Commission

The law limits an individual's contribution for the primary election to \$700. Contribution reports available on the PDC web site reveal at least three individuals have exceeded the limitation. Lois Curtis has contributed \$1000 for the primary election, Dana Quitslund has contributed \$800 for the primary and Elizabeth Sullivan has contributed \$1000 for the primary election.

Summary

The above demonstrates a clear and deliberate disregard by Ms. Rolfes in complying with the laws and regulations governing campaign finance disclosure. Ninety six percent of the contributions reported on the four C3 reports referenced above were not deposited within 5 business days. Not one weekly report has been filed timely. Required occupation/employer data has been so consistently omitted as to suggest no effort has been made to either acquire or report the information. And what can you say about the contribution limits violation?

I request you commence an investigation into these flagrant violations immediately.

Sincerely,



Edward B. Habecker

Enclosures: Formal Complaint  
Certification  
C3 Reports  
Contributor Analysis  
Contributor Data